

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709

SKYLER H. PEARSON
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
skyler.pearson@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Marvin Dewey Morris and Meihua Zhang,

Plaintiffs,

v.

Merrick Garland, Attorney General of the
United States of America; Alejandro
Mayorkas, Secretary of the Department of
Homeland Security; Ur M. Jaddou, Director,
U.S. Citizenship and Immigration Services;
Clyde Moore, Field Office Director, Las
Vegas Field Office U.S. Citizenship and
Immigration Services,

Defendants.

Case No. 2:22-cv-00426-APG-DJA

**Stipulation to Extend the United States'
Deadline to Answer**

(Second Request)

Plaintiffs Marvin Dewey Morris and Meihua Zhang and the United States of
America, on behalf of Federal Defendants Merrick Garland, Alejandro Mayorkas, Ur M.
Jaddou, and Clyde Moore, through counsel, hereby stipulate and agree as follows:

1. Plaintiffs filed their Complaint on March 8, 2022.

2. Plaintiffs served the United States with a copy of the Summons and
Complaint on June 9, 2022.

3. The current deadline for Federal Defendants to answer or otherwise respond
is October 7, 2022.

4. The parties have agreed that the United States shall have 30 additional days to file an answer or other responsive pleading on behalf of Federal Defendants. Since the time Plaintiffs filed their complaint, Federal Defendants have issued a notice of intent to deny to which Plaintiff responded. The notice and Plaintiff's response thereto may resolve some or all the issues involved in this litigation and/or alleviate the need for court intervention. Accordingly, the parties request that Federal Defendants' deadline to file a responsive pleading be extended an additional 30 days to allow the parties to continue to work towards resolution.

5. This stipulation is made in good faith and not for the purpose of delay. Therefore, the parties request that the Court extend the deadline for the United States to answer or otherwise respond by November 7, 2022.

Respectfully submitted this 6th day of October 2022.

JASON M. FRIERSON
United States Attorney

/s/ Peter L. Ashman
PETER L. ASHMAN
617 S. 8th Street, Suite B
Las Vegas, Nevada 89101
pla@ashmanlaw.com

Attorney for Plaintiffs

/s/ Skyler H. Pearson
SKYLER H. PEARSON
Assistant United States Attorney

Attorneys for the United States

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: October 7, 2022